

# **Exhibit 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**UNITED STATES, *et al.*,**

***Plaintiffs,***

**- against -**

**GOOGLE LLC,**

***Defendant.***

**Civil Action No. 1:23-cv-00108  
(LMB) (IDD)**

**[PROPOSED] ORDER GRANTING GOOGLE LLC’S MOTION TO SEAL LIMITED  
PERSONAL INFORMATION IN EXHIBIT B TO THE DECLARATION OF TYLER  
GARRETT IN SUPPORT OF DEFENDANT GOOGLE LLC’S MOTION TO  
TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

This matter comes before the Court on Defendant Google LLC’s Motion to Seal Limited Personal Information in Exhibit B to the Declaration of Tyler Garrett in Support of Defendant Google LLC’s Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) (“Motion”). In its Motion, Google seeks an order sealing the names of forty-one current or former employees, who are non-parties to this litigation and are listed in Exhibit B to the Garrett Declaration.

In the Fourth Circuit, “before a district court may seal any court documents, . . . it must (1) provide public notice of the request to seal and allow interested parties a reasonable opportunity to object, (2) consider less drastic alternatives to sealing the documents, and (3) provide specific reasons and factual findings supporting its decision to seal the documents and for rejecting the alternatives.” *Ashcraft v. Conoco, Inc.*, 218 F.3d 288, 302 (4th Cir. 2000).

The Court finds that Google has filed a Notice of Filing Sealed Material, that there are no less drastic alternatives to Google's redactions, and that sealing this information is warranted to maintain the privacy of non-parties to this litigation. For the foregoing reasons, and pursuant to Local Civil Rule 5 and for good cause shown, Google's Motion is GRANTED.

It is hereby ORDERED that the names listed in Exhibit B to the Garrett Declaration shall remain permanently under seal.

Entered this \_\_\_\_ day of \_\_\_\_\_, 2023.

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The Honorable Leonie M. Brinkema  
United States District Judge